



FILED ELECTRONICALLY VIA ECFS

February 6, 2006

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: EB-06-TC-060 & EB-06-36, Certification of CPNI Filing (February 6, 2006)

Dear Ms. Dortch:

Enclosed for filing is Citizens Communications Company's "Certification of CPNI Filing – February 6, 2006", as ordered in EB-06-TC-060 and EB-06-36.

If you have questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script, reading "Kevin Saville".

Kevin Saville
Associate General Counsel
2378 Wilshire Blvd.
Mound, Minnesota 55364
Telephone: 952-491-5564
Facsimile: 952-491-5515
ksaville@czn.com

Enclosure

cc: Byron McCoy, Telecommunications Consumers Division, Enforcement Bureau,
Federal Communications Commission, Room 4-A234, 445 12th Street, SW,
Washington, DC 20554, via e-mail to: byron.mccoy@fcc.gov

Best Copy and Printing, Inc., Portals II, 445 12th Street, SW, Room CY-B402,
Washington, DC 20554, via e-mail to: fcc@bcpiweb.com

CITIZENS COMMUNICATIONS COMPANY
SECTION 64.2009(e) CERTIFICATION

I, Peter B. Hayes, a duly authorized officer of Citizens Communications Company, hereby certify on behalf of Citizens Communications Company and its subsidiaries which are telecommunications carriers, that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the rules of the Federal Communications Commission, codified at 47 C.F.R. 64.2001-64.2009, implementing Section 222 of the Communications Act of 1934, as amended.



Peter B. Hayes
Executive Vice President Sales, Marketing and Business Development
Citizens Communications Company

February 6, 2006

STATEMENT OF EXPLANATION

In accordance with 47 C.F.R. 64.2009(e), the following statement accompanies the officer compliance certificate and explains how the operating procedures of Citizens Communications Company and its subsidiaries which are telecommunications carriers ensure that the Company is in compliance with the Commission's CPNI rules, as codified at 47 C.F.R. 64.2001-64.2009. The Citizens Communications subsidiaries that are telecommunications carriers generally do business under the name "Frontier Communications":

- Frontier Communications has implemented processes to ascertain whether customer CPNI will be used in marketing efforts and whether customer approval for the use of CPNI is required under the Commission's CPNI rules.
- Frontier Communications does not share CPNI among its affiliates, unless prior customer approval has been obtained or no customer approval is required under the Commission's CPNI rules.
- Frontier Communications does not disclose CPNI to unaffiliated third parties except as authorized by the customer or as compelled or authorized by law.
- Frontier Communications notifies customers of their right to restrict access to, use of, and disclosure of their CPNI.
- When Frontier Communications uses CPNI on inbound or outbound telephone calls where customer consent is required, Citizens obtains "one-time" customer consent for such use.
- Only authorized Frontier Communications personnel can access CPNI. Company personnel so authorized, such as customer service representatives and billing and collection personnel, are trained regarding the appropriate access to, use of, and disclosure of CPNI. Failure to abide by the applicable policies and procedures is cause for discipline, up to and including termination.
- Personnel employed in Frontier Communications' marketing groups are provided with an explanation of what information may be shared to market services to customers and what information may not be shared under the Commission's CPNI rules. All marketing campaigns that utilize CPNI are subject to managerial

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approval and to verification of customer approval before CPNI is utilized.
Records related to these marketing campaigns are maintained for at least one year.

- Frontier Communications' managerial personnel monitor access to, use of, and disclosure of CPNI on an on-going basis to ensure compliance with the applicable policies and procedures and to evaluate their effectiveness.